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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TYRONE CASTEEL,

Defendant.

No. 3:22-cr-00073-SLG-MMS

COUNTS 1-5

DISTRIBUTION OF CHILD
PORNOGRAPHY

Vio. of 18 U.S.C. § 2252A(a)(2), (b)(1)

CRIMINAL FORFEITURE

ALLEGATION

18 U.S.C. § 2253, 28 U.S.C. § 2461(c),
and Fed. R. Crim. P. 32.2(a)

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I N D I C T M E N T

The Grand Jury charges that:

COUNT 1

On or about September 4, 2021, within the District of Alaska, the defendant, TYRONE CASTEEL, using a means and facility of interstate and foreign commerce, knowingly distributed child pornography and material containing child pornography that

had been shipped and transported in and affecting interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

COUNT 2

On or about July 23, 2022, within the District of Alaska, the defendant, TYRONE CASTEEL, using a means and facility of interstate and foreign commerce, knowingly distributed child pornography and material containing child pornography that had been shipped and transported in and affecting interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

COUNT 3

On or about July 24, 2022, within the District of Alaska, the defendant, TYRONE CASTEEL, using a means and facility of interstate and foreign commerce, knowingly distributed child pornography and material containing child pornography that had been shipped and transported in and affecting interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

COUNT 4

On or about August 27, 2022, within the District of Alaska, the defendant, TYRONE CASTEEL, using a means and facility of interstate and foreign commerce, knowingly distributed child pornography and material containing child pornography that had been

shipped and transported in and affecting interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

COUNT 5

On or about September 13, 2022, within the District of Alaska, the defendant, TYRONE CASTEEL, using a means and facility of interstate and foreign commerce, knowingly distributed child pornography and material containing child pornography that had been shipped and transported in and affecting interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Counts 1-5 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c).

Upon conviction for the offenses in violation of 18 U.S.C. § 2252A set forth in Counts 1-5 of this Indictment, the defendant, TYRONE CASTEEL, shall forfeit to the United States pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c) any interest in any and all matter which contains visual depictions produced, transported, mailed, shipped, or received in violation thereof; any property constituting or traceable to gross profits or other proceeds the defendant obtained as a result of the aforementioned violation; and any and

all property used or intended to be used to commit and to promote the commission of the
aforementioned violation

All pursuant to 18 U.S.C. § 2253, 28 U.S.C. § 2461(c), and Fed. R. Crim. P. 32.2(a).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ James Klugman
JAMES KLUGMAN
Assistant U.S. Attorney
United States of America

s/ Kathryn Vogel for
S. LANE TUCKER
United States Attorney
United States of America

DATE: 9-20-22